

REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application and for indicating that the replacement drawings filed on June 9, 2006 have been approved.

Disposition of Claims

Claims 1-29 are pending in the application. Claims 1, 15, and 27 are independent. The remaining claims depend, either directly or indirectly, from claims 1, 15, and 27.

Claim Amendments

Independent claims 1, 15, and 27 have been amended to clarify that “the dynamic memory comprises first dynamic memory from a first processor and second dynamic memory from a second processor.” Support for the aforementioned amendment may be found, for example, in Figure 2 and paragraphs [0028]-[0029] of the referenced application. Further, claims 8, 11, and 18 have been amended to clarify that the first and second cross-calls are issued to the first processor and the second processor. Support for the aforementioned amendment may be found, for example, in [0046] of the referenced application. No new matter has been added by any of the aforementioned amendments.

Rejections under 35 U.S.C. § 103

Claims 1-7, 9-10, 12-17, and 19-29 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,874,074 (“Burton”) in view of U.S. Patent Application

Publication No. 2002/0199172 (“Bunnell”). To the extent that the rejection applies to the amended claims, the rejection is respectfully traversed.

To establish a *prima facie* case of obviousness, “[f]irst, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations” (*see* MPEP § 2143). Further, “*all* words in a claim must be considered in judging the patentability of that claim against the prior art [emphasis added]” (*see* MPEP § 2143.03). Applicant respectfully asserts that the references, when combined, fail to teach or suggest all the limitations of amended independent claims 1, 15, or 27.

As discussed above, the independent claims have been amended to clarify that that “the dynamic memory comprises first dynamic memory from a first processor and second dynamic memory from a second processor.” The aforementioned limitation requires at least two processors and a tracing framework that includes functionality to allocate dynamic memory from at least two of the processors.

Turning to the prior art, neither Burton nor Bunnell teach or suggest a tracing framework configured to allocate dynamic memory from two or more processors. In fact, Burton and Bunnell are both completely silent with respect to a system that includes multiple processors; rather, both Burton and Bunnell describe inventions directed to single processor systems.

In view of the above, Burton and Bunnell, whether viewed separately or in combination, fail to teach or suggest all the limitations of amended independent claims 1, 15 and 27. Thus, amended independent claims 1, 15, and 27 are patentable over Burton and Bunnell. Dependent claims are

patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 8, 11, and 18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Burton in view of Bunnell and further in view of U.S. Patent No. 6,622,226 ("Dussud"). To the extent that the rejection applies to the amended claims, the rejection is respectfully traversed.

Dependent claims 8 and 11 depend from independent claim 1. Further, dependent claim 18 depends from independent claim 15. As discussed above, Burton and Bunnell fail to teach or suggest all the limitations of amended independent claims 1, 15 and 27. Further, Dussud fails to teach or suggest that which Burton and Bunnell lack. Specifically, like Burton and Bunnell, Dussud is directed to an invention implemented on a single processor system and is completely silent with respect to a multiprocessor system.

Moreover, as discussed above, amended dependent claims 8, 11, and 18 recite, in part, "issuing a first cross-call *to the first processor and the second processor*; [...] issuing a second cross-call *to the first processor and the second processor*." Dussud, along with Burton and Bunnell, is completely silent with respect to a process issuing calls to two or more processors (*i.e.*, issuing a cross-call; *see e.g.*, Referenced Application, [0046]-[0047]).

In view of the above, Burton, Bunnell, and Dussud, whether viewed separately or in combination, fail to teach or suggest all the limitations of amended independent claims 1 and 15. Thus, amended independent claims 1 and 15 are patentable over Burton and Dussud for at least the reasons given above. Claims 8 and 11 depend, directly or indirectly, from amended independent claim 1 and, thus, are patentable over the cited art for at least the same reasons. Further, claim 18 depends, directly or indirectly, from amended independent claim 15 and, thus, is patentable over the


cited art for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 03226/340001; SUN040170).

Dated: November 15, 2006

Respectfully submitted,

By  #33,986
for Robert P. Lord
Registration No.: 46,479
OSHA · LIANG LLP
1221 McKinney St., Suite 2800
Houston, Texas 77010
(713) 228-8600
(713) 228-8778 (Fax)
Attorney for Applicant